

**DENIED**  
MOOT

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

Apr 02, 2013



CHARLES E. RENDLEN, III  
UNITED STATES BANKRUPTCY JUDGE

In re:  
Karen Wilkes,

Debtor(s)/Movant(s),

) Case No. 12-51017-705  
) Chapter 7  
)

) **Motion to Delay Discharge Order**  
) **for the Limited Purpose of Filing**  
) **Reaffirmation Agreement(s)**  
)

) The Law Office of Tracy A. Brown  
) Tracy A. Brown, #61161MO  
) LaShea Borden #63418MO  
) Attorneys for Debtor  
) 1034 S. Brentwood Blvd, Suite 1830  
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**MOTION TO DELAY DISCHARGE ORDER FOR THE LIMITED PURPOSE OF**  
**FILING REAFFIRMATION AGREEMENT(S)**

COMES NOW DEBTOR, Karen Wilkes, and for this Motion to Delay Entry of Discharge Order for the Limited Purpose of Filing Reaffirmation Agreement(s), states as follows:

1. That Debtor filed this Chapter 7 Petition on November 15, 2012. David Sosne was the duly appointed, acting and qualified Trustee ("Trustee").
2. That Debtor filed a Statement of Intent indicating a desire to reaffirm the following:
  - a) Vehicle financed with Santander, which has been returned to creditor for execution and for filing with the Court.
3. That on February 20, 2013, the Clerk of this Court entered an Order Discharging Debtor prior to Debtor being able to obtain and file the desired Reaffirmation Agreement(s).
4. That on March 7, 2013, Debtor's Motion to Set Aside Discharge was granted.
5. That Debtor's Counsel is continuing with efforts to obtain the desired Reaffirmation Agreement(s) and believes with additional time, will be able to do so.
6. That Debtor respectfully requests that the entry of the Discharge Order be delayed up to and including May 15, 2013, for the limited purpose of filing the desired Reaffirmation Agreement(s).

WHEREFORE, the Debtor respectfully moves this Honorable Court to enter its Order delaying entry of the Discharge Order for the Limited Purpose of Filing Reaffirmation Agreement(s); allow time up to and including May 15, 2013 to do so; and for such additional or alternative relief as may be just and proper.

The Law Office of Tracy A. Brown, P. C.

By: /s/  
Tracy A. Brown, #61161MO  
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**Certificate of Service**

The undersigned hereby certifies that a copy of the foregoing Motion to Set Aside Discharge Order for the Limited Purpose of Filing Reaffirmation Agreement(s) was served either through the Court's ECF system or by regular mail this 1<sup>st</sup> Day of April, 2013, upon the Parties below.

/s/  
Brian J Lambert

Karen Wilkes  
4727 North Hills Lane  
St. Louis, MO 63121

David Sosne  
8909 Ladue Road  
St. Louis, MO 63124  
Chapter 7 Trustee

Office of the US Trustee  
111 South 10<sup>th</sup> Street, Suite 6353  
St. Louis, MO 63102

Santander Consumer  
Bankruptcy Department  
P.O. Box 961245  
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